

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION

KATRESHA KING AND TIFFANY HOLMES,  
INDIVIDUALLY AND ON BEHALF OF HER  
DAUGHTER, KAISLEY BOOTH

PLAINTIFFS

V.

CASE NO.: 4:20cv170-DMB-JMV

MID-SOUTH HAULING, INC.

DEFENDANT

NOTICE OF REMOVAL OF ACTION  
FROM THE COUNTY COURT OF COAHOMA COUNTY, TO THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION

TO: Edward P. Connell, Jr., Esq.  
Merkel & Cocke  
Post Office Box 1388  
Clarksdale, Mississippi 38614-1388

COMES NOW, the undersigned Defendant, Mid-South Hauling, Inc., through counsel, as authorized by 28 U.S.C. §1441, and in support of this removal would show unto the Court the following:

1. On September 15, 2020, an action was commenced against Mid-South Hauling, Inc., in the County Court of Coahoma County, Mississippi, entitled “Katresha King and Tiffany Holmes, Individually and on Behalf of Her Daughter, Kaisley Booth v. Mid-South Hauling, Inc.” and being Cause No. 14-CO-2020-0157 on the general docket of said Court. Defendant, Mid-South Hauling, Inc., has been served with process.

2. The above described action is one for which this Court has original jurisdiction under the provisions of 28 U.S.C. §1332, and is one which may be removed to this Court pursuant to the provisions of 28 U.S.C. §1441 in that it is a civil action, wherein the amount

in controversy exceeds the sum of \$75,000.00 exclusive of interest and costs as Plaintiff's counsel has demanded compensatory damages in excess of that sum, and there is a diversity of citizenship of Plaintiffs and Defendant as further set forth herein.

3. Plaintiffs at the time this action was commenced were and still are citizens of Phillips County, Arkansas and the Defendant, Mid-South Hauling, Inc. was at the time this action commenced, and still is, a corporation organized and existing under the laws of the State of Mississippi, with its principal place of business located in Coahoma County, Mississippi.

4. Defendant Mid-South Hauling, Inc. appears herein by its attorneys specifically and solely for the purpose of removing this suit from the County Court of Coahoma County, Mississippi to this Court.

5. Defendant, promptly after the filing of this Notice of Removal, will give written notice of same to the adverse party by written notice to the attorneys of record for Plaintiffs, and will file a copy of the Notice of Removal with the Clerk of the County Court of Coahoma County, Mississippi and effect the removal of this suit from the County Court of Coahoma County, Mississippi to this Court, to the end that said state court shall proceed no further unless and until this suit is remanded.

RESPECTFULLY SUBMITTED, this the 28<sup>th</sup> day of September, 2020.

UPSHAW, WILLIAMS, BIGGERS  
& BECKHAM, LLP

BY: s/Richard L. Kimmel  
RICHARD L. KIMMEL, MBN: 3772

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Certificate of Service

I hereby certify that on September 28, 2020 I electronically filed the foregoing with the Clerk of the Court which sent notification to the following:

Edward P. Connell, Jr., Esq.  
Merkel & Cocke  
Post Office Box 1388  
Clarksdale, Mississippi 38614-1388

\s\ Richard L. Kimmel  
RICHARD L. KIMMEL